

ZEICHNER ELLMAN & KRAUSE LLP
575 Lexington Avenue
New York, New York 10022
Telephone: (212) 223-0400
Facsimile: (212) 753-0396
Michael S. Davis
Ronald M. Neumann

SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, New York 10017
Telephone: (212) 455-2000
Facsimile: (212) 455-2502
Bryce L. Friedman
Alexander B. Simkin

Attorneys for AIU Insurance Company, American Home Assurance Company, Chartis Specialty Insurance Company (formerly known as American International Specialty Lines Insurance Company), Granite State Insurance Company, Illinois National Insurance Company, Lexington Insurance Company and National Union Fire Insurance Company of Pittsburgh, PA

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:
CHEMTURA CORPORATION *et al.*,

Debtors,

CHEMTURA CORPORATION, AND CHEMTURA CANADA
CO./CIE,

Plaintiffs,

v.

AIU INSURANCE COMPANY; AMERICAN HOME
ASSURANCE COMPANY; AMERICAN INTERNATIONAL
SPECIALTY LINES INSURANCE CO. (n/k/a CHARTIS
SPECIALTY INSURANCE COMPANY); GRANITE STATE
INSURANCE COMPANY; ILLINOIS NATIONAL
INSURANCE COMPANY; LEXINGTON INSURANCE
COMPANY; and NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendants.

Chapter 11

Case No.: 09-11233
(REG)

Jointly Administered

Adversary Proceeding
No.: 10-02881(REG)

**NOTICE OF MOTION
TO WITHDRAW THE
REFERENCE TO THE
BANKRUPTCY COURT**

FILED
U.S. BANKRUPTCY COURT
2010 MAR 29 P 4:11
S.D. OF N.Y.

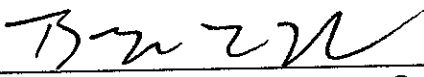
PLEASE TAKE NOTICE, that upon the annexed Declaration of Bryce L. Friedman, dated March 29, 2010, the exhibits provided therewith, and the accompanying memorandum of law, dated March 29, 2010, Defendants AIU Insurance Company, American Home Assurance Company, Chartis Specialty Insurance Company (formerly known as American International Specialty Lines Insurance Company), Granite State Insurance Company, Illinois National Insurance Company, Lexington Insurance Company, and National Union Fire Insurance Company of Pittsburgh, Pa. (the "Chartis Insurers"), will move in the United States District Court for the Southern District of New York, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for the entry of an Order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011(a), and Local Bankruptcy Rule 5011-1, withdrawing the reference to the United States Bankruptcy Court for the Southern District of New York of the above-captioned adversary proceeding.

[remainder of page intentionally left blank]

PLEASE TAKE FURTHER NOTICE that, pursuant to the SDNY Local Civil Rule 6.1(b), any opposing affidavits or answering memoranda shall be served within fourteen days after service of the moving papers and any reply affidavits or memoranda of law shall be served within seven days after service of the answering papers.

Dated: New York, New York
March 29, 2010

SIMPSON THACHER & BARTLETT LLP

By: 
Bryce L. Friedman (bfriedman@stblaw.com)
Alexander B. Simkin (asimkin@stblaw.com)

425 Lexington Avenue
New York, N.Y. 10017-3954
Telephone: (212) 455-2000
Facsimile: (212) 455-2502

ZEICHNER ELLMAN & KRAUSE LLP
Michael S. Davis (mdavis@zeklaw.com)
Ronald M. Neumann (rneumann@zeklaw.com)
575 Lexington Avenue
New York, New York 10022
(212) 223-0400

Attorneys for AIU Insurance Company, American Home Assurance Company, Chartis Specialty Insurance Company (formerly known as American International Specialty Lines Insurance Company), Granite State Insurance Company, Illinois National Insurance Company, Lexington Insurance Company, and National Union Fire Insurance Company of Pittsburgh, Pa.